

MILA LAWSIN FONNER **Plaintiff**
30 Gambrel Ct.
Holland, Pa. 18966
215.860.3924
milagris@verizon.net

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MILA LAWSIN :
Plaintiff, :

V.

TRAVELERS HOME & MARINE **CIVIL ACTION NO. 14-cv-3738**
INSURANCE CO. ET AL
Defendants **:** **JURY TRIAL DEMANDED**

**AMENDED MOTION DEMANDING RELIEF FROM ICS MERRILL AND
CHRISTOPHER T. RYAN (combined) , FOR FIVE MILLION DOLLARS .**

Plaintiff, Mila Lawsin Fonner, is now demanding this Honorable Court , relief from ICS Merrill , a division of Examination Management Services, Inc., and Christopher T. Ryan; for Five Million Dollars for damages to Plaintiff as follows :

1. ILLEGAL SURVEILLANCE , INTIMIDATION , THREAT AND POSSIBLE MURDER

Christopher T. Ryan an employee of ICS Merrill, VIA GPS , has been following the Plaintiff for months and years for no reason at all.

1. DISCOVERY :

Plaintiff noticed Black car with all windows tinted, following her on her way from home to Dry Cleaning store . Black car continued following Plaintiff from the store, despite her effort to lose him by making turns in different section of the community. Scared for her life, decided to head home and called ' 911 '. Police came in 2 vehicles . Stated ' we know who he is . '

6. INTIMIDATION, THREAT OR A DEADLY COLLISION ?

One Saturday Morning, Plaintiff was driving to church approximately 8AM on Middle Holland Rd., Holland, Pa. When a chocolate brown car suddenly crossed Middle Holland Rd coming from Jordan Road toward Plaintiff's car which was driving at the same time on Middle Holland Rd. Plaintiff managed to escape the collision from this chocolate brown car. She also noticed a white car exiting on the entrance way of Tapestry Development.

To be able to escape from collision by a hair was a Miracle. This was a planned 2- man-hit-job . This incident has stopped Plaintiff from attending Saturday Masses which she has done for years.

Plaintiff reported this incident to Northampton Police. See exhibit 5.

7. PLAINTIFF IDENTIFIED MR. RYAN

Driving from church on Middle Holland Rd, Plaintiff was behind a chocolate brown car that almost killed her. She recognized the car and immediately took the license plate number and as she was closely behind this car as the red light stopped the cars, driver of this chocolate brown car looked at his drivers side mirror , an eye contact was established between the driver and Plaintiff. She got nervous and very scared. The face she saw was the same she saw for weeks in the Chapel, the same car that almost killed her on the collision of Middle Holland Rd.
PLAINTIFF REPORTED INCIDENT TO NORTHAMPTON POLICE. Exhibit 5 .

8. PLAINTIFF HAS A VIDEO OF MR. RYAN ILLEGAL SURVEILLANCE

ICS Merrill sent Travelers a Video of Mr. Ryan doing video of Plaintiff walking her dog in her yard. Travelers sent the Video to Plaintiff . Plaintiff has the video and the accompanying letter , is exhibit 6.

ICS Merrill and Christopher Ryan , defendants , through their lawyer has asked Philadelphia County of Common Pleas Court that Plaintiff asked for Relief for their illegal Surveillance see exhibit 7- brief filed in Philadelphia Common Pleas Court .

At the same token, ICS Merrill and Christopher Ryan (combined) through their lawyer is ordering this Honorable Court to sanction me for making them defendants in my lawsuit filed in Philadelphia County Common Pleas Court . See exhibit 8.

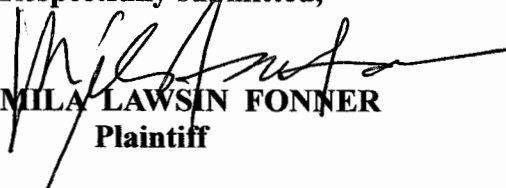
Bucks County Common Pleas Court had transferred this case to Federal Court and this case has been litigated in this court under 12-cv- 3839. Based on this premise, Bucks County had lost it's Jurisdiction to hear this case . Therefore, it lacks authority to hear this case and any Action should be considered by this court to be NULL AND VOID.

ICS Merrill and Christopher Ryan cannot cite Bucks County Common Pleas Court Order as It was an improper court and it's Actions were invalid.

ICS Merrill and Christopher Ryan are named defendant for the first time in Plaintiff's Complaint filed in Philadelphia Common Pleas Court . See exhibit 9.

WHEREFORE , based on the foregoing , Plaintiff amends her Complaint to demand Five Million Dollars from ICS Merrill and Christopher Ryan (combined) for punitive damages, emotional turmoil, fear, intimidation, Threats, lack of sleep, unable to attend Saturday Masses lack of peace of mind , continued to fear collision , accidents as what has happened That Saturday Morning. Plaintiff has remained guarded until today of any possible threat to her life. Now armed .

Respectfully submitted,


MILA LAWSIN FONNER
Plaintiff

Date 10/9/2014

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|------------------------------------|---|-------------------------|
| <hr/> | : | |
| MILA LAWSIN FONNER | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | No. 14-cv-003738 |
| | : | |
| TRAVELERS HOME & MARINE | : | |
| INSURANCE ET AL | : | |
| | : | |
| Defendants. | : | |
| <hr/> | : | |

ORDER

AND NOW, this _____ day of _____, 2014, upon
consideration of Plaintiff, Mila Lawsin Fonner Motion to Amend Complaint to demand
Compensation from ICS Merrill and Christopher Ryan (combined) for damages inflicted on
Plaintiff, for Five Million Dollars, It is hereby ORDERED and DECREED that Motion
is GRANTED .

BY THE COURT :

J.

CERTIFICATE OF SERVICE

**The undersigned hereby certifies that on this day 9th day of
October 2014, a true and correct copy of the foregoing Motion was served
with a copy sent via U.S. Mail to :**

**Ms. Allie J. Hallmark, Esq.
1700 Market St. Suite 3100
Phila. Pa. 19103**

**Mr. Michael T. Droogan, Esq.
1515 Market St. Suite 1220
Phila., Pa. 19102-1903**



**MILA LAWSIN FONNER
Plaintiff**

EXHIBIT # 1



Township of Northampton¹⁰

50 Township Road
Richboro, PA 18954-1592

Phone: (215) 322-6111 Fax: (215) 357-3592
Police and Fire Emergency 911

POLICE DEPARTMENT • M. Barry Pilla, Jr., Chief of Police Business: (215) 322-6111

February 12, 2013

Mila Lawsin
30 Gambrel Ct.
Holland, PA 18966

Dear Ms Lawsin:

The Northampton Township Police Department has received your letter dated February 5, 2013. The procedure to obtain a report is as follows:

Please fill out the attached Incident Report Request Form, sign the back of the form and return the completed form to my attention. At this time your request will be processed and you will be notified as to when you can pick up the report(s). Please note that there is a \$25.00 charge for each report that you request.

If you have any questions or I may be of assistance to you in this matter, please do not hesitate to contact my office.

Sincerely yours,


M. Barry Pilla, Jr.
Chief of Police

Cert. Mail Receipt - # 7011-1150-000-9603-5760

Case ID: 140500974

10
1

NORTHAMPTON TOWNSHIP POLICE
50 Township Rd. Richboro, PA 18954
HQ 215-322-6111 FAX 215-357-3592

INCIDENT REPORT - REQUEST FORM**REQUESTER'S INFORMATION****PRINT**

DATE 2/14/2013
Mila LAWSIN
 FIRST NAME MIDDLE LAST NAME
N/A
 CRIMINAL JUSTICE AGENCY NAME
N/A
 HOME / AGENCY ADDRESS
215 860 3924
 HOME TELEPHONE # AGENCY # WORK or CELL#
Mila Lawsin 2/14/47 1/15/47
 *SIGNATURE OF REQUESTOR DATE OF BIRTH

INCIDENT INFORMATION**PRINT**

Stalking / surveillance 54-11-12107
 TYPE OF EVENT(S) INCIDENT REPORT# if known
1) 10/24/2011 (2) Near-death incident - Michelle Holland et
 TIME & DATE OF EVENT(S) OCCURRED per letter 1/24/2013
Mila LAWSIN Mila
 LAST NAME OF INVOLVED FIRST NAME MIDDLE
Same
 LAST NAME OF INVOLVED FIRST NAME MIDDLE

*Please consider this a written request for information from the Northampton Township Police Department. I would like to obtain a copy or examine/inspect the record copy of the above incident or person(s) involved in an incident. I believe the above document(s) constitute public records pursuant to Pennsylvania's Right to Know Law, 65 P.S. ~ 66.1 et seq. I agree to pay the current processing fee (\$25.00) for each copy requested, and will allow up to 5 working days for my request to be processed. If my request is denied I understand my fee will be refunded and an explanation for the denial will be supplied.

TURN OVER

10

READ and SIGN BELOW:

Any one requesting a copy of an INCIDENT REPORT from the Northampton Township Police Department must comply with the following procedure:

All requests will be submitted on the NTPD request form which is available at the Northampton Township Police Headquarters 50 Township Rd. Richboro, PA 18954. All requests are usually processed within 5 working days of the date of the request.

A fee is charged (currently \$25.00) per report requested. No requested incident report will be released without the payment. A receipt will be issued on payment. Criminal Justice Agencies are exempt from the fee.

If a requested report is denied the fee will be refunded with an explanation supplied.

DISCLAIMER: The Northampton Township Police Department may not have verified some or all of the information and does not guarantee the accuracy thereof. Anyone relying on this information or further disseminating it assumes all risk in so doing. Further, the information provided is only that information available from the records of the Northampton Township Police Department.

INDEMNITY AGREEMENT: In consideration of furnishing the information by the Northampton Township Police Department to the undersigned, in accordance with the Consolidated Statutes of the Commonwealth of Pennsylvania, the undersigned acknowledges the intended use is for legal purposes and releases the Township of Northampton, the Northampton Township Police Department, any agent, official, or employee of Northampton Township, from any liability in connection with the undersigned's reliance on the accuracy of said form and any and all liability whatsoever arising out of the use of the said information; and further agrees to hold harmless the Township of Northampton, the Northampton Township Police Department and any agent, official, or employee of Northampton Township and to defend them from any and all costs and claims arising out of such reliance, use or dissemination.

NOTICE: Any person(s) who gives or causes to be given false information to any law enforcement officer, with respect to the commission of any crime or incident, is guilty of violation of the Pennsylvania Crimes Code, Section 4906 (B) (1). This crime is punishable by a fine and imprisonment.

I, MILA LAWSIN, HAVE READ THE ABOVE
PRINT FULL NAME

INFORMATION AND ACKNOWLEDGE BY MY SIGNATURE THAT I FULLY AND COMPLETELY UNDERSTAND WHAT I HAVE READ AND PROMISE TO REMAIN TRUE TO THE INDEMNITY AGREEMENT, AS STATED ABOVE:

Mila Lawsin 2/14/2013
SIGNATURE DATE

.....
NTPD USE

Approved/Date/By _____ Disapproved/Date/By _____

Processed By _____ Date _____ Comment _____

Requestor Contacted _____ Date _____ Letter Sent _____

Updated 01/17/2011

Case ID: 140500974



Township of Northampton

50 Township Road
Richboro, PA 18954-1592

Phone: (215) 322-6111 Fax: (215) 357-3592
Police and Fire Emergency 911

POLICE DEPARTMENT • M. Barry Pilla, Jr., Chief of Police Business: (215) 322-6111

February 18, 2013

Mila Lawsin
30 Gambrel Ct.
Holland, PA 18966

Dear Ms Lawsin:

On behalf of Chief M. Barry Pilla, Jr., I am writing you this letter to acknowledge receipt of your check for \$25.00 and the Incident Report Request Form that you filled out concerning incident report #54-11-12107. However, in our research we have found another incident report #54-11-12086, that may be of assistance to you with the civil suite you mentioned in your letter.

I sincerely hope that the two reports help you to clear up this matter.

01

458

67-25
318 4117


DATE 1/22/13

MILALAWSON

Pay to the order of Northampton Township Police \$ 25.00

Twenty five only

DOLLARS 25

 M&T Bank

MEMO Police Report William

10313029551 98463720360458

EXHIBIT # 2

- ☐ Administrative ☐ Gang Related ☐ Paperless
☒ Investigation ☐ Accident ☐ Arrests Made
☐ Suspects ☐ Ready for DA / Prosecutor

Officer: **THOMAS HALPIN, STATION TENDER** 10/24/2011**Incident Report Form**

| | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|-------------------------|---|----------------------------|---|---|------------------------|-----|------|-----|-----------|------------------------|--------|--------|------|------|--------------|--|--|-----------------------|--|--|--|-------|---|--|
| Log Number 54-11-12086 | Incident Number | File Number | Case Number | UCR | | | | | | | | | | | | | | | | | | | | | |
| Incident Type 4028 | Information Reported | | Dispatcher TH531 | Source WALKIN | | | | | | | | | | | | | | | | | | | | | |
| Date Received 10/24/2011 | Rovd 1330 | Disp 1330 | Arr 1330 | Cld 1330 | | | | | | | | | | | | | | | | | | | | | |
| INCIDENT OCCURRED AT OR BETWEEN | | Earliest Date and Time 10/24/2011 (Monday) | | Latest Date and Time 10/24/2011 1930 (Monday) | | | | | | | | | | | | | | | | | | | | | |
| Location HEATHER VALLEY RD HOLLAND PA 18966 | | Cross Street GAMBREL CT | | Intersection <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | | |
| GPS Coordinates X Y | | Gang | | Arson Value | | | | | | | | | | | | | | | | | | | | | |
| Premise Code STREET STREET OR HIGHWAY | | Business Name | | | | | | | | | | | | | | | | | | | | | | | |
| Modus Operandi Coding ENTRY: EXIT: METHOD: | | VICTIM: PROPERTY AREA: TIME OF DAY: ----- WEAPON USED: | | | | | | | | | | | | | | | | | | | | | | | |
| Caller / Complainant Type Normal <input checked="" type="checkbox"/> Anonymous <input type="checkbox"/> Hangup <input type="checkbox"/> Refused <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | | | | | | |
| INVOLVED PERSONS | | | | | | | | | | | | | | | | | | | | | | | | | |
| COMPLAINANT | | | | | | | | | | | | | | | | | | | | | | | | | |
| Name (Last, First, Middle) - Address RYAN, CHRISTOPHER | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td>Juvenile <input type="checkbox"/></td> <td>Date of Birth</td> <td>Age</td> <td>Race</td> <td>Sex</td> <td>Ethnicity</td> <td>Social Security Number</td> </tr> <tr> <td>Weight</td> <td>Height</td> <td>Hair</td> <td>Eyes</td> <td>Phone Number</td> <td colspan="2"></td> </tr> <tr> <td colspan="4">Driver License Number</td> <td>State</td> <td colspan="2">Last Name edit <input type="checkbox"/></td> </tr> </table> | | | | | Juvenile <input type="checkbox"/> | Date of Birth | Age | Race | Sex | Ethnicity | Social Security Number | Weight | Height | Hair | Eyes | Phone Number | | | Driver License Number | | | | State | Last Name edit <input type="checkbox"/> | |
| Juvenile <input type="checkbox"/> | Date of Birth | Age | Race | Sex | Ethnicity | Social Security Number | | | | | | | | | | | | | | | | | | | |
| Weight | Height | Hair | Eyes | Phone Number | | | | | | | | | | | | | | | | | | | | | |
| Driver License Number | | | | State | Last Name edit <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | |
| Link Comments | | | | | | | | | | | | | | | | | | | | | | | | | |
| INVOLVED VEHICLES | | | | | | | | | | | | | | | | | | | | | | | | | |
| Involvement OTHER <input checked="" type="checkbox"/> Type (A=Auto/Truck) A Plate Number PA Plate State PC Tag Year 10/24/2011 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vehicle Year 2003 | Make TOYT | Model HGH | Color GLD | Vehicle Identification Number (VIN) | | | | | | | | | | | | | | | | | | | | | |
| Insurance Company | | Insurance Company Policy Number | | | | | | | | | | | | | | | | | | | | | | | |
| Involvement Comments | | | | | | | | | | | | | | | | | | | | | | | | | |
| INVOLVED BUSINESSES / ORGANIZATIONS | | | | | | | | | | | | | | | | | | | | | | | | | |
| Business / Organization Name ICS | | | | | | | | | | | | | | | | | | | | | | | | | |
| Phone 1 856-783-7667 | | Phone 2 | Phone 3 | Business Address VOORHEES, NJ 08043 | | | | | | | | | | | | | | | | | | | | | |
| Involvement Comments | | | | | | | | | | | | | | | | | | | | | | | | | |
| RESPONDING / INVOLVED UNITS, OFFICERS, TIMES | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 1 | Vehicle TH531 | Officer 1 | Officer 2 | Officer 3 | | | | | | | | | | | | | | | | | | | | | |
| Unit 2 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 3 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Division 2 | | Supervisor SL40 | | | | | | | | | | | | | | | | | | | | | | | |
| 54-11-12086 10/24/2011 <input checked="" type="checkbox"/> APPROVED BY: STEVEN LECOMPTE, SGT. IRF 15 APPROVED ON: 10/26/2011 | | | | | | | | | | | | | | | | | | | | | | | | | |

Case ID: 140500974

16

Northampton Township Police

54-11-12086

- ☐ Administrative ☐ Gang Related ☐ Paperless
☒ Investigation ☐ Accident ☐ Arrests Made
☐ Suspects ☐ Ready for DA / Prosecutor

Officer: THOMAS HALPIN, STATION TENDER - 10/24/2011

Incident Report Form

Unit 4

Agency Numbers

Unit & Times

COMMENTS / NARRATIVES

Title

INFO ON PRIVATE INVESTIGATOR

Locked
N

Created By / On

THOMAS HALPIN, STATION TENDER

10/24/2011

Updated By / On

TH631

10/24/2011

Approve By / On

OCTOBER 24, 2011 INITIAL (S.T. HALPIN #531)

Christopher Ryan, private investigator, came to HQ with his credentials, advising he will be in area of Heather Valley Rd and Gambrel Ct until 1930 tonight.
Gold Toyota Highlander

BCPR and sector car aware of info.

Case ID: 140500974

54-11-12086

10/24/2011



APPROVED BY: STEVEN LECOMPTE, SGT.

APPROVED ON: 10/25/2011

PAGE 2

10
1

Mila Lawsin
30 Gambrel Ct
Holland, Pa. 18966

May 22, 2013

Northampton Township Police
50 Township Rd.
Richboro, Pa.

Sir:

The attached Incident Report 54-11-12086 of 10/24/2011 contains lots of errors on his credentials presented by Christopher Ryan in Northampton Township Police Dept. on 10/24/2011 : 1) His surveillance car is old black van with black painted windows, not a gold toyota highlander, 2) his phone number is 484-844-2790 and not 856-783-7557- not working . 3) employed by ICS MERRILL and not by ICS which are totally two different companies 4) He does not live in Voorhees, NJ 08043.

He was subpoena for documents, videos and all communications with Travelers including his contract with Travelers, regarding his illegal surveillance stalking and near-death incident in middle holland Rd , Holland, Pa. , illegal tapping of cell and landline phones, computer and any forensic evidence illegally obtained against mila lawsin, the plaintiff, so far he has not submitted any.

I might asked Sgt. McLaughlin to testify in Federal Court if there will be a Jury Trial.

Thank you for your cooperation.

Very truly yours,



MILA LAWSIN.

EXHIBIT # 3

CHRISTOPHER T. RYAN | LinkedIn

6/13/13 5:36 PM

Search ..

Advanced

Home Profile Network Jobs Interests

Premium Solutions

Upgrade

CHRISTOPHER T. RYAN

Licensed Private Investigator at ICS Merrill
Greater Philadelphia Area Security and Investigations

Current ICS Merrill, A E Bail Bonds, Aquilas Services LLC.

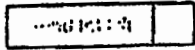
Previous United American Security, Michael Hall and Associates, Power Pak Beverage

Education Bounty Hunter Training Academy

548 Darby Rd
Ridley Park, Pa 19078
C - 484-497-6596



Lisa Frikker-Grues, CFE
Fraud Investigations Asst. Coach at Capital O...
+Connect



25
connections

www.linkedin.com/pub/christopher-t-ryan/171120/30a

LinkedIn

Summary

To obtain a career in the field of Criminal Justice

Experience**Private Investigator**

ICS Merrill

March 2011 – Present (2 years 4 months)

Responsibilities: The primary responsibilities of this position include the following activities related to insurance claims investigations:

- Conducting Surveillance (Fixed/Mobile)
- Obtaining Videotaped Documentation of Subjects
- Conducting Background / Activity Checks, and Courthouse Research
- Obtaining Written and Recorded Statements
- Writing Investigative Reports

Some of the talents, tools, & characteristics possessed, necessary, & associated with this position:

- Highest level of integrity
- Commitment to excellence
- Extremely detail oriented
- Ability and willingness to travel as necessary within a multi-state coverage area
- Flexibility to work varied / irregular hours and days
- Strong computer and internet skills
- Self-starter who takes on challenging responsibilities
- Demand and hold self accountable for outstanding results and performance.
- Strong attention to detail
- Commitment to accuracy and quality
- Always meeting goals or deadlines
- Possess a Valid State-issued Driver's License
- Possess a reliable surveillance vehicle, several covert and standard video cameras, and laptop computer with Windows Operating System, Microsoft Office & Word, and a mobile as well as home internet connection

Bail Enforcement Officer

A E Bail Bonds

February 2012 – Present (1 year 5 months) | Commonwealth of PA

ADS YOU MAY BE INTERESTED IN

USC Masters in Healthcare
Masters in Health Administration
Online. No GRE Req'd, Request
Info Today.

HIPAA Compliant Solution
Global Leader Offers Award
Winning Document Management
For Healthcare



Health Practitioners
Update Your Online Practice
Profile to reach new patients for
free!

People Also Viewed

Crystal Barnett
Attorney at Law Office of Crystal D.
Barnett

Benny Rogers
Private Investigator

Lee Anne Molnar
Desktop Investigator at Lemieux &
Associates

brian moelerman

Brian Moelerman
Private Investigator/Field Trainer

Michael McHargue
Investigator at Meridian Investigative
Group

Crane Powell
Senior Case Manager at G4S
Compliance and Investigations

Doug Mailhot
Siu Director at CaseFirst BlueCross
BlueShield

Joseph Verdeur III
Surveillance Agent/Private Investigator
at Stumar Investigations

CHRISTOPHER T. RYAN | LinkedIn

6/13/13 5:36 PM

Fugitive Recovery Agent**A E Ball Bonds**

January 2011 – Present (2 years 6 months) | Commonwealth of PA

Fugitive Recovery, Ball Enforcement, Bounty Hunting

Process Server**Aquilas Services LLC.**

February 2012 – Present (1 year 5 months) | Commonwealth of PA

Security Officer**United American Security**

October 2010 – March 2011 (6 months)

Duties: Closely monitoring my assigned location, be it static or patrolled, through surveillance, attempting to spot suspicious behavior and prevent problems, including illegal activity; When emergencies occur, responsibilities include directing people in the area to safety, contacting emergency responders, attempting to determine the source of the problem and containing the threat; Also guard entrances and exits, and must thoroughly screen people and packages to make sure no unauthorized items or individuals go where they shouldn't.

Certified Agent**Michael Hall and Associates**

January 2010 – February 2011 (1 year 2 months) | Philadelphia, PA

Duties: Provides security for the school district staff, students, buildings and property through patrol of school building(s) and building perimeters, including parking lots, to prevent unauthorized visitors or property damage and to provide for general building security; does related work as required; Oversees and participates in security inspections of school facilities; Develops and periodically monitors a reporting system designed to detect security issues in school facilities; Makes recommendations to correct security issues once identified; Participates in providing security for all occupants of school buildings and grounds; Provides assistance and security to community agencies using school facilities and for after school activities; Prevents unauthorized visitors from entering school buildings and/or loitering on school grounds; Informs counselors, parents, teachers and school administrators of student behavior problems; Carries out investigations, upon request, regarding cases of legal residency of students; Monitors illegal student absences; Maintains liaison with police, fire and other municipal departments to insure maximum use of their services in order to provide adequate security and safety; Represents school district in court-related matters; Prepares reports and assists in special assignments as directed; Uses computer applications or other automated systems such as spreadsheets, word processing, calendar, e-mail and database software in performing work assignments; May assist in handling emergency disciplinary matters; May, under specifically defined and limited circumstances, use force.

Account Manager**Power Pak Beverage**

June 2004 – October 2010 (6 years 5 months) | Greater Philadelphia Area

Sales and Distribution of Red Bull; Duties: Establish a new customer base, service existing customers, distribute product line within route area (Chester and Montgomery County), check product levels, maintain proper rotation, and restock where needed, fill out invoices and submit paperwork to customers, and maintain accurate financial records for all customers (250+).

Certifications**Licensed Private Investigator**

PA, NJ, DE, & MD, License Surveillance Investigator & SIU Investigator

March 2011 – Present

Fugitive Recovery Agent; Ball Enforcement Officer

Bounty Hunter Training Academy

Scott Shumas
Private Detective (Investigator) at SFS
& Associates, LLC.

In Common with CHRISTOPHER T.

☐ You ☐ CHRISTOPHER T.


CHRISTOPHER T. RYAN | LinkedIn

6/13/13 5:36 PM

January 2012 – Present

ACT 235 Certified
Commonwealth of Pennsylvania
January 2011 – Present

Ball Enforcement Officer
State of Delaware
August 2012 – Present

Emergency Medical Technician
DCCC, License Diploma
June 2010 – Present

BLS (Basic Life Support)
DCCC
June 2010 – Present

CPR
DCCC
June 2010 – Present

First Aid
DCCC
June 2010 – Present

AED
DCCC
June 2010 – Present

Courses

DCCC

- Emergency Medical Technician

Delaware County Community College

- Related Coursework: Criminal Justice, Criminal Law I, Criminal Law II, Criminology, U.S. Courts, Criminal Procedures, Principles of Investigation, Organized Crime, Terrorism, and The Youthful Offender.

Independent Coursework

- Bounty Hunter Training Academy

Skills & Expertise

Most endorsed for...

CHRISTOPHER T. RYAN | LinkedIn

6/13/13 5:36 PM

1 Private Investigations

ACT 235 Certified

CPR Certified

BLS Certified

Physical Security

11
—

CHRISTOPHER T. also knows about...

Criminal Justice

Criminal Investigations

Firearms

Emergency Management

Background Checks

Surveillance

Criminology

Enforcement

Investigation

Criminal Law

Education

Bounty Hunter Training Academy

Fugitive Recovery / Ball Enforcement, Fugitive Recovery / Ball Enforcement
2012 – 2012

Deleware County Community College

Associates Degree, Criminal Justice
2009 – 2011

1 course

DCCC

Emergency Medical Technician, EMT
2010 – 2010

1 course

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...

EXHIBIT # 5

Northampton Township Police**54-13-08613**

- ☐ Administrative ☐ Gang Related ☐ Paperless
☒ Investigation ☐ Accident ☐ Arrests Made
☐ Suspects ☐ Ready for DA / Prosecutor

Officer: JAMES GALDWELL, OFC. - JC27

07/30/2013

Incident Report Form

reported. She states that this vehicle had chrome type wheels.

Ms. Lawsln further states that approx two weeks ago she observed a white vehicle that was identical to a vehicle that nearly struck her in a collision in 2012 on Middle Holland road. She identifies the driver as Christopher Ryan, a PI from CSI Merrill. She further explains that this subject has been following her as a result of a civil suit she has against Traveler Insurance Company. She believes that his continued presence in the area of her is a violation of her personal rights.

Ms. Lawsln further stated that she obtained a registration from a maroon color BMW 335i vehicle that was in her neighborhood on July 24 and 25th and that the occupant believed to be @ 18 years of age was watching her residence. The tag listed is GNB7632. This registration comes back to Chevrolet out of Cranberry Township, PA. to a couple residing in that township.

Matter of Record

August 15, 2013

Mrs. Lawsln came into NTPD to report that the report she received was incorrect. She wanted to change the facts presented to the following:

On June 18, 2013 she left St. Bede's church went northbound on Holland road and made a right turn onto Middle Holland Rd. She observed a chocolate brown Ford Explorer with Tan wheel skirts directly in front of her. Mrs. Lawson states she observed the registration as HFJ-0466 and also observed a Christopher Ryan look in his rear view mirror. Mrs. Lawsln claims they both made eye contact and then the Ford Explorer fled east on Middle Holland rd and made a left turn onto Justice Dr where it came to a stop. Mrs Lawsln saw this vehicle stopped on Justice Dr but she continued east on Middle Holland Rd.

Case ID: 140500974

54-13-08613

07/30/2013

☒ APPROVED BY: STEVEN LECOMPTE, SGT.
 APPROVED ON: 07/30/2013

PAGE 2

| Northampton Township Police | | | | | | 54-13-08613 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---------------------------------------|---|--------------------------------------|--|---|-------------------------------------|--|--|-----------------------------------|------------------------------------|------------------|------------------|-----------------|--------------------|------------------------|------|--|--------|--------|------|------|-------------------------------------|--|--|--|--|--|--|--------|--------------------|--|--|--|--|--|--------|--|--|--|--|--|--|
| <input type="checkbox"/> Administrative <input type="checkbox"/> Gang Related <input type="checkbox"/> Paperless <input checked="" type="checkbox"/> Investigation <input type="checkbox"/> Accident <input type="checkbox"/> Arrests Made <input type="checkbox"/> Suspects <input type="checkbox"/> Ready for DA / Prosecutor | | Officer: JAMES CALDWELL, OFC. - JC27 | | 07/30/2013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Report Form | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Log Number 54-13-08613 | Incident Number 54-13-08953 | File Number | Case Number | UCR | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Type 4928 Information Reported | | | Dispatcher MW68 | Source WALKIN | District 320 | Status CLOSED | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Date Received 07/30/2013 | Road 1350 | Disp 1350 | Arrv 1350 | Cld 1405 | Disposition REPORT REPORT FILED | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| INCIDENT OCCURRED AT OR BETWEEN | | Earliest Date and Time | | Latest Date and Time | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Location 50 MIDDLE HOLLAND RD HOLLAND PA 18966 | | | Cross Street OLD JORDAN RD | | Intersection <input checked="" type="checkbox"/> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GPS Coordinates X Y | | | Gang | | Areon Value | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Premise Code GOVERN GOVERNMENT BUILDING (ALL TYPES) | | | Business Name | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Modus Operandi Coding ENTRY: EXIT: METHOD: | | | | VICTIM: PROPERTY AREA: TIME OF DAY: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ----- WEAPON USED: ----- | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Caller / Complainant Type Normal <input checked="" type="checkbox"/> Anonymous <input type="checkbox"/> Hangup <input type="checkbox"/> Refused <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| INVOLVED PERSONS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">Name (Last, First, Middle) - Address LAWSON, MILA 30 GAMBREL CT HOLLAND PA 18966</td> <td style="width: 5%;">Juvenile <input type="checkbox"/></td> <td style="width: 15%;">Date of Birth 01/15/1947</td> <td style="width: 5%;">Age 62</td> <td style="width: 5%;">Race W</td> <td style="width: 5%;">Sex F</td> <td style="width: 5%;">Ethnic N</td> <td style="width: 20%;">Social Security Number</td> </tr> <tr> <td></td> <td></td> <td>Weight</td> <td>Height</td> <td>Hair</td> <td>Eyes</td> <td colspan="2">Phone Number 215-801-9409</td> </tr> <tr> <td></td> <td></td> <td colspan="4">Driver License Number 16374941</td> <td>State PA</td> <td>Later Name edit <input type="checkbox"/></td> </tr> </table> | | | | | | | | Name (Last, First, Middle) - Address LAWSON, MILA 30 GAMBREL CT HOLLAND PA 18966 | Juvenile <input type="checkbox"/> | Date of Birth 01/15/1947 | Age 62 | Race W | Sex F | Ethnic N | Social Security Number | | | Weight | Height | Hair | Eyes | Phone Number 215-801-9409 | | | | Driver License Number 16374941 | | | | State PA | Later Name edit <input type="checkbox"/> | | | | | | | | | | | |
| Name (Last, First, Middle) - Address LAWSON, MILA 30 GAMBREL CT HOLLAND PA 18966 | Juvenile <input type="checkbox"/> | Date of Birth 01/15/1947 | Age 62 | Race W | Sex F | Ethnic N | Social Security Number | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Weight | Height | Hair | Eyes | Phone Number 215-801-9409 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Driver License Number 16374941 | | | | State PA | Later Name edit <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Link Comments | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RESPONDING / INVOLVED UNITS, OFFICERS, TIMES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table style="width: 100%;"> <tr> <th style="text-align: left;">Vehicle</th> <th style="text-align: left;">Officer 1</th> <th style="text-align: left;">Officer 2</th> <th style="text-align: left;">Officer 3</th> <th style="text-align: left;">Officer 4</th> <th style="text-align: left;">Division</th> <th style="text-align: left;">Supervisor</th> </tr> <tr> <td>Unit 1</td> <td>JC27</td> <td></td> <td></td> <td></td> <td>2</td> <td>SL40</td> </tr> <tr> <td>Unit 2</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Unit 3</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Unit 4</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> | | | | | | | | Vehicle | Officer 1 | Officer 2 | Officer 3 | Officer 4 | Division | Supervisor | Unit 1 | JC27 | | | | 2 | SL40 | Unit 2 | | | | | | | Unit 3 | | | | | | | Unit 4 | | | | | | |
| Vehicle | Officer 1 | Officer 2 | Officer 3 | Officer 4 | Division | Supervisor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 1 | JC27 | | | | 2 | SL40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unit 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Agency Numbers Units & Times | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COMMENTS / NARRATIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Title INFORMATION REPORTED | | | | | | | Locked N | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Created By / On JAMES CALDWELL, OFC. | | 07/30/2013 | | Updated By / On JC27 | | 08/15/2013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Approve By / On | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July 30, 2013 Comp/Mila Lawsin came to NTPD to report that she had a discrepancy with a previous report she had picked up. The Comp indicates that there is question about the wheel characteristics in a vehicle she had previously | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Case ID: 140500974 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 54-13-08613 | | 07/30/2013 | | <input checked="" type="checkbox"/> APPROVED BY: STEVEN LECOMPTE, SGT. | | PAGE 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| IRF 1.6 | | APPROVED ON: 07/30/2013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

12
—

MILA LAWSIN
30 Gambrel Ct
Holland, Pa. 18966

Northampton Township Police
Richboro, Pa.

Sir,

In January 24, 2013 I was at your Headquarter and spoke to police officer McLaughlin and later another police officer joined in the conversation regarding : 1)
The reason for illegal stalking /surveillance in 2011 by PI was due to a "civil case."
This was mentioned by the Police officers who told me the reason for the illegal stalking of black SUV with windows painted black, following me all over the place and has been seen by neighbors parking in proximity to my residence. The police officers arrived in answer to my 911 call .

2) I also mentioned of a near-to death experience whereby an old dark brown van crosses middle holland road without stopping as I was driving also at the same time in Middle Holland Road on my way toward St. Bede's Church on holland rd. I have the right of way as Middle Holland Rd is the main highway and the brown car was coming from Old Jordan RD , a road that intersects with Middle holland Rd. I also quickly noticed a white car was sitting in the entrance of Tapestry Development which I found out later that , the white car should not be there as he was in the entrance to the development. The white car should be setting on the right side, not on the left side ; the exit side as the car was facing toward Middle Holland Rd. I quickly swirled my car to the pavement of Tapestry to avoid an accident happening . This happened so fast. I was very lucky to be alive and with no scratches on the car and able to avoid in matter of seconds or few inches .If I did not see the car coming toward me, the accident would have hit me on the driver side and would have possibly either killed me or put me in permanent disability for life.

3) I was very scared of the incident , but my dedication to Saturday Mass made me ignore the incident which in other times I would have stopped and get all the information and call 911. I also ignored for the thinking that the driver must have been drunk from Friday night celebration that he missed the Stop sign on Old Jordan Rd. before crossing middle holland Rd This incident happened AUGUST 11, 2012 approximately 8:am. Saturday morning.

4) One afternoon about three (3) weeks from the incident I saw again this Chocolate colored van traveling in my neighborhood, in fact it was travelling Heather Valley Rd. which is just few feet away from my house. This made me scared. That incident was not because somebody did not stop at stop sign but a plan to kill me or permanently damage me and make it look like an accident, carried out by two men. They knew me and has been following me as it's only them aside from me that have knowledge that I use Middle Holland Rd every Saturday morning to church and at the same time-

Case ID: 140500974

12

8:00 AM. I wouldn't be surprised if they are the same people that have been surveilling and following me since 2011.

5) This is a very serious criminal matter. I hope the above incident will not be repeated to me and others and the persons who aimed at destroying me be persecuted.

6) I am also again asking the name of the Private Investigator and the name of his client. These information is critical to my case and I would like this available to me either by mail or I can pick it up, before April 1, 2012, this is before Discovery of the Jury Trial in Federal Court Phila., Pa.

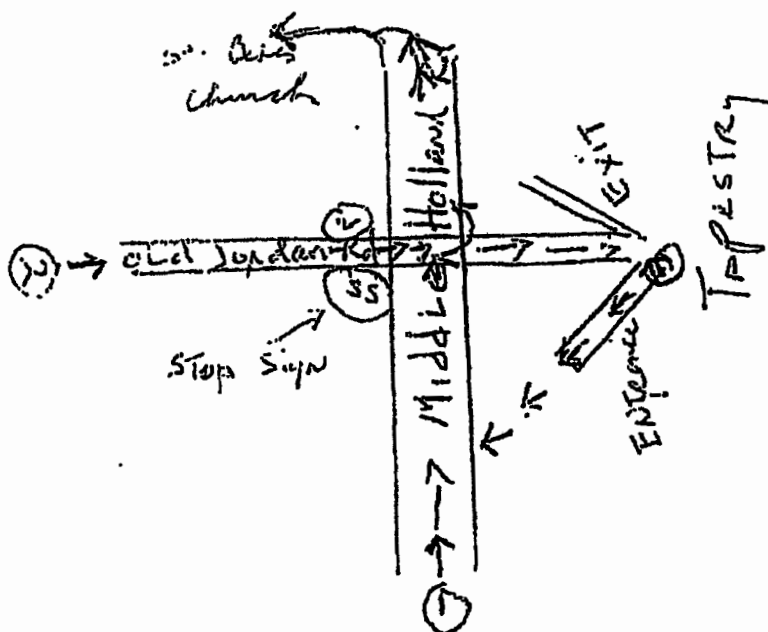
7) As You all know, 'am representing myself against Travelers Home and Marine Insurance Company and this Civil case is being tried in Federal Court in Philadelphia. This case is in Discovery Stage, meaning, I need evidence to present to the Judge and my neighbor will testify for me regarding the surveillance incident. I might list you as a witness to the incident.

Please call me at 215.860.3924 for questions. Your assistance in this matter is very much appreciated.

Very truly yours,

Mila Lawsin
MILA LAWSIN
Feb. 5, 2013

Sketch of how the incident happened :



- ① mila LAWSIN
- ② chocolate brown car
- ③ white car on hit

EXHIBIT # 6

LITCHFIELD
CAVO_{LLP}
Attorneys at Law

An Illinois Limited Liability Partnership

Michael T. Droogan, Jr.
Email: Droogan@litchfieldcavo.com

WRITER'S ADDRESS:
1515 Market Street, Suite 1130
Philadelphia, PA 19102-1903
215-557-0111
Direct: 215-999-5760
215-557-3771 (fax)

9
—

July 2, 2013

Ms. Mila Lawsin
30 Gambrell Ct.
Holland, PA 18966

Re: *Mila Lawsin v. Travelers*
Our File No.: 2282-873

Dear Ms. Lawsin:

Enclosed please find a copy of the videotape of surveillance of you conducted by ICS-Merrill. Kindly note this will be marked defendant's Exhibit 18 and it may be introduced at the trial of this lawsuit.

Very truly yours,

MICHAEL T. DROOGAN, JR.

MTD/
Enclosure

EXHIBIT # 7

JACOBY DONNER, P.C.

B. Christopher Lee, Esq. #24419

chris.lee@jacobydonner.com

Allie J. Hallmark, Esq. Pa. #314466

ahallmark@jacobydonner.com

1700 Market Street, Suite 3100

Philadelphia, PA 19103

T (215) 563-2400

F (215) 563-2870

MILA LAWSIN FONNER,

Plaintiff,

v.

TRAVELERS HOME & MARINE
INSURANCE CO. ET AL.

Defendants.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

MAY TERM, 2014

NO. 00974

**PRELIMINARY OBJECTIONS OF DEFENDANTS ICS MERRILL &
CHRISTOPHER RYAN TO THE COMPLAINT OF MILA LAWSIN FONNER**

ICS Merrill, a division of Examination Management Services, Inc., and Christopher Ryan preliminarily object to the Complaint of Mila Lawsin Fonner as follows:

1. Plaintiff filed a Complaint in this Court on May 12, 2014. A copy of the Complaint is attached as Exhibit A.
2. Plaintiff names four defendants, among them ICS Merrill and Christopher Ryan.
3. Plaintiff asserts a single claim against Defendant Travelers Home & Marine Insurance Co. ("Travelers") but seeks no relief from ICS Merrill or Christopher Ryan.
4. Plaintiff alleges a history of litigation in the Bucks County Court of Common Pleas and United States District Court for the Eastern District of Pennsylvania.
5. Specifically, on January 12, 2012, Plaintiff filed a lawsuit in the Court of Common Pleas of Bucks County against Travelers, where she alleged that Travelers failed to pay

her lost wages after she was allegedly injured in a car accident, Mila Lawsin v. Travelers Home & Marine Insurance Co., Case No. 2012-00150 (the “Bucks County Action”). A copy of the Bucks County Third Amended Complaint is attached as Exhibit B.

6. The case was removed to the United States District Court for the Eastern District of Pennsylvania on July 9, 2012, Mila Lawsin v. Travelers Home & Marine Insurance Co., No. 2:12-cv-03839 (the “Federal Court Action”). Copies of the Bucks County and Federal Court Dockets are attached as Exhibits C and D respectively.

7. She alleges that Travelers hired ICS Merrill and Ryan for what she terms “illegal” surveillance during the course of the underlying the Bucks County and Federal Court Actions.

8. In the Complaint, she further alleges that she subpoenaed Defendants ICS Merrill and Ryan in the Bucks County Action regarding their investigation.

9. On December 18, 2013, The Honorable Clyde Waite of the Court of Common Pleas of Bucks County entered an order in the Bucks County Action stating:

Plaintiff is barred from pursuing any further litigation against Travelers Home & Marine Insurance Company, the Hinkle Agency, employees of Travelers or related defendants raising the same or related claims as those raised in her Third Amended Complaint and other pleadings filed prior thereto, all of which stem from a motor vehicle accident that occurred on February 5, 2011, and alleged injuries and damages . . .

Defendants request that this Court take judicial notice of the Bucks County Order, a copy of which is attached as Exhibit E.

10. Because of ICS Merrill and Ryan’s involvement in the underlying Bucks County and Federal Court Actions, this action is in violation of the Order which dismissed with prejudice the prior action in Bucks County.

11. That is, as a result of the Bucks County Order dismissing the prior action, Plaintiff has no right to file the present action against Defendants ICS Merrill or Christopher Ryan.

12. Moreover, Defendants are unable to craft an answer to Plaintiff's Complaint because it is not divided in paragraphs and has no discernible order as required by Pa. R.C.P. 1022.

13. Accordingly, under Pa. R.C.P. 1028, Defendants object and raise the following Motions to Dismiss and Strike the Complaint in its entirety with prejudice.

**MOTION TO DISMISS
For Failure to Conform to a Rule of Court – Rules 1028(a)(2) and 1022**

14. Pursuant to Pa. R.C.P. 1022, "[e]very pleading shall be divided into paragraphs numbered consecutively. Each paragraph shall contain as far as practicable only one material allegation."

15. Although Plaintiff has no basis to burden the Defendants with another pleading as it is clear from the Complaint that Plaintiff has no cause of action against ICS Merrill and Ryan, it would be impossible to answer Plaintiff's Complaint because it rambles for 13 pages with no paragraph numbers or other consecutive organization of any kind.

16. As a result, Plaintiff's Complaint should be stricken under Rule 1028(a)(2) for failure to comply with Rule 1022 pertaining to paragraphing of pleadings.

**MOTION TO DISMISS
For Legal Insufficiency (Demurrer) – Pa. R.C.P. 1028(a)(4)**

17. Plaintiff has not asserted nor can the Complaint be read to assert a single cause of action that would allow her to obtain relief against Defendants ICS Merrill and Christopher Ryan.

18. Indeed, the prayer for relief states "Mila Lawsin Fonner is demanding from Travelers an amount of \$20 Million Dollars as Compensation for this Lawsuit. She also Demands from this court a Jury Trial by her Peers."

19. Nowhere in the 13 pages of Plaintiff's Complaint does she state any claim or request for relief against Defendants ICS Merrill and Ryan. Accordingly, this action should be dismissed under Rule 1028(a)(4) for legal insufficiency.

MOTION TO DISMISS
For Failure to Conform to a Rule of Court – Rules 1028(a)(2) and 233.1

20. Pursuant to Pa. R.C.P. 233.1, when a *pro se* plaintiff alleges the same or related claims of a prior action against the same or related defendants, a court may (1) *sua sponte* dismiss the action and (2) bar the *pro se* plaintiff from pursuing additional *pro se* litigation against the same or related defendants raising the same or related claims.

21. As stated above, on January 12, 2012, Plaintiff filed suit in the Court of Common Pleas of Bucks County, which was removed to the Eastern District on July 9, 2012

22. During the Bucks County and Federal Court Actions, Travelers hired ICS Merrill, a division of ESMI, which provides investigative services to insurance companies.

23. Christopher Ryan, as an employee of ICS Merrill, investigated Plaintiff's activities to uncover information relating to the validity of her alleged injuries and unemployment after the car accident.

24. Throughout the Federal Court Action and in her Third Amended Complaint in Bucks County, Plaintiff accused Defendants of "illegal" surveillance and attempting to harm Plaintiff in the course of their investigation.

25. Plaintiff sought to subpoena the depositions and records of ICS Merrill and Ryan in both the Bucks County and Federal Court Actions.

26. Plaintiff also moved to have Defendants held in contempt of court and sanctioned for alleged failure to submit certain materials related to the investigation.

27. Plaintiff repeatedly moved to remand the Federal Court Action back to the state court and continued filing in Bucks County while her motions were denied in federal court.

28. On August 19, 2013, The Honorable Curtis Joyner of the Eastern District granted Travelers' Motion for Summary Judgment and entered Judgment in its favor and against Plaintiff. A copy of the Federal Court Order is attached as Exhibit F.

29. On December 18, 2013, after Plaintiff filed her Third Amended Complaint in state court, Judge Clyde Waite dismissed the Bucks County Action.

30. Moreover, Judge Waite barred Plaintiff from filing any subsequent action against Travelers or related defendants and raising the same or related claims as those raised in the Third Amended Complaint. See Bucks County Order at Exhibit E.

31. Judge Waite used language almost identical to that of Rule 233.1, which grants courts the discretion to bar a *pro se* plaintiff from pursuing a similar claim against similar defendants in a later action.

32. Accordingly, Plaintiff is barred from filing this action against the Defendants, who were agents of Travelers in the course of the underlying claim and related to the Bucks County and Federal Court Actions.

WHEREFORE, Defendants ICS Merrill and Christopher Ryan request that this Court dismiss Plaintiff Mila Lawsin Fonner's Complaint in its entirety with prejudice and hold Plaintiff in contempt for violating the Bucks County Order entered on December 18, 2013.

Respectfully submitted,

JACOBY DONNER, P.C.

Date: June 5, 2014

By: /s/ Allie J. Hallmark
B. Christopher Lee, Esquire
Allie J. Hallmark, Esquire
Attorneys for ICS Merrill and Christopher Ryan

MILA LAWSIN FONNER,

Plaintiff,

v.

TRAVELERS HOME & MARINE
INSURANCE CO. ET AL.

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

MAY TERM, 2014

NO. 00974

Filed and Attested by
PROTHONOTARY
05 JUN 2014 02:58 pm
C. FORTE

ORDER

AND NOW, this _____ day of _____, 2014, upon consideration of Defendants ICS Merrill and Christopher Ryan's Preliminary Objections to Plaintiff's Complaint, and any responses thereto, it is hereby ORDERED that the Preliminary Objections are SUSTAINED, and:

1. Plaintiff's Complaint is DISMISSED with prejudice for legal insufficiency;
2. Plaintiff's Complaint is DISMISSED with prejudice pursuant to Pennsylvania Rule of Civil Procedure 233.1; and
3. Plaintiff's Complaint is STRICKEN for failure to comply with Pennsylvania Rule of Civil Procedure 1022.

BY THE COURT:

J.

CERTIFICATE OF SERVICE

I hereby certify that, on the date set forth below, I served a true and correct copy of the foregoing Preliminary Objections upon the following via ECF notification and first class mail, as follows:

Mila Lawin Fonner (*pro se*)
30 Gambrel Court
Holland, PA 18966

Michael Droogan, Esquire
Litchfield Cavo, LLP
1515 Market Street, Suite 1220
Philadelphia, PA 19102

/s/ Allie J. Hallmark
Allie J. Hallmark, Esquire

Dated: June 5, 2014

EXHIBIT # 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MILA LAWSIN FONNER,

Plaintiff,

v.

TRAVELERS HOME & MARINE
INSURANCE CO. ET AL.

Defendants.

:
:
:
:
:
:
:
:
:
:
:

No. 14-cv-003738

ORDER

AND NOW, this ____ day of _____, 2014, upon consideration of Defendants ICS Merrill and Christopher Ryan's Preliminary Objections to Plaintiff's Complaint, and any responses thereto, it is hereby ORDERED that Defendants' Preliminary Objections are SUSTAINED, and Plaintiff's Complaint is DISMISSED.

It is further ORDERED that Plaintiff is sanctioned for violating Pennsylvania Rule of Civil Procedure 233.1 and Bucks County Court Order dated December 18, 2013.

BY THE COURT:

Curtis Joyner, J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-------------------------|---|------------------|
| MILA LAWSIN FONNER, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | No. 14-cv-003738 |
| | : | |
| TRAVELERS HOME & MARINE | : | |
| INSURANCE CO. ET AL. | : | |
| | : | |
| Defendants. | : | |

**REPLY BRIEF OF DEFENDANTS ICS MERRILL AND CHRISTOPHER RYAN
IN SUPPORT OF THEIR PRELIMINARY OBJECTIONS TO
THE COMPLAINT OF MILA LAWSIN FONNER**

While Plaintiff did not actually respond to Defendants ICS Merrill and Christopher Ryan’s Preliminary Objections, the ICS Defendants nonetheless find it prudent to file this reply brief in support of the preliminary objections of both the ICS Defendants and Defendant Travelers Home & Marine Insurance Company (“Travelers”) to Plaintiff’s Complaint. A copy of the ICS Defendants’ Preliminary Objections is attached at Exhibit A.

It is clear from Plaintiff’s Response to Defendants Preliminary Objections—in addition to Plaintiff’s Complaint—that Plaintiff has no cause of action against the ICS Defendants. A copy of Plaintiff’s Response is attached at Exhibit B. Indeed, Plaintiff’s Response is directed solely at Travelers and does not address any of the arguments set forth by the ICS Defendants in their Preliminary Objections at all. Consequently, the ICS Defendants reiterate that Plaintiff’s Complaint fails to set forth any claim for relief against them.

Moreover, under Pennsylvania Rule of Civil Procedure 233.1, Plaintiff is barred from filing any action against the Defendants and is in direct violation of Bucks County Court Order

dated December 18, 2013 by continued pursuit of this action. The ICS Defendants join Travelers in its request for prompt dismissal of this action and sanctions against Plaintiff.

WHEREFORE, Defendants ICS Merrill and Christopher Ryan, respectfully request that this Honorable Court sustain their Preliminary Objections and dismiss Plaintiff's Complaint, with prejudice and hold Plaintiff in contempt for violation of Bucks County Court Order.

Respectfully submitted,

JACOBY DONNER, P.C.

Dated: September 30, 2014

By: /s/ Allie J. Hallmark
Allie J. Hallmark, Esquire
PA ID No. 314466
1700 Market Street, Suite 3100
Philadelphia, PA 19103
215-563-2400

*Attorneys for Defendants,
ICS Merrill and Christopher Ryan*

CERTIFICATE OF SERVICE

I hereby certify the foregoing paper has been filed electronically and is available for viewing and downloading from the Electronic Case Filing System of the United States District Court for the Eastern District of Pennsylvania.

I further hereby certify that, in accordance with F.R.C.P. 5, service has been made upon the parties as follows:

(Via ECF)

Michael T. Droogan, Jr., Esquire
Litchfield Cavo, LLP
1515 Market Street, Suite 1220
Philadelphia, PA 19102

(Via First Class Mail)

Ms. Mila Lawsin Fonner
30 Gambrell Ct.
Holland, PA 18966

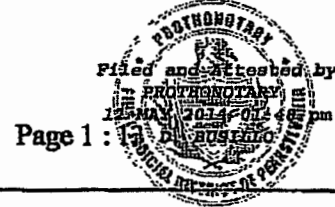
Date: September 30, 2014

/s/ Allie J. Hallmark
Allie J. Hallmark

EXHIBIT # 9

MILA LAWSIN
30 Gambrel Court
Holland, Pa. 18966
215.860.3924
milagris@verizon.net

Plaintiff



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION**

MILA LAWSIN FONNER

Plaintiff,

v.

TRAVELERS HOME & MARINE
INSURANCE CO.
One Tower Square, Hartford, Ct 06183

TRAVELERS HOME & MARINE
INSURANCE CO.
1105 Berkshire Blvd. Wyomissing Pa. 19601 :

HINKLE AGENCY, INC.
975 Second Street Pike, Richboro, Pa.

Christopher Ryan, 548 Darby Rd.
Ridley Park, Pa. 19078

ICS MERRILL
9485 Regency Sq. Blvd. Suite 400
Jacksonville, Fl 32225 :

Defendants

CIVIL ACTION

No. _____

JURY TRIAL DEMANDED

COMPLAINT

**TO THE HONORABLE JUDGES OF THE SAID COMMON PLEAS COURT OF THE
COUNTY OF PHILADELPHIA :**

**The Petitioner, Mila Lawsin Fonner, the Plaintiff had filed a Lawsuit against Travelers
Home & Marine Insurance Company (herein: ' Travelers ') et al defendants, respectfully
represents the following :**

Case ID: 140500974

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THIS MOTION is for equitable, monetary, and other relief brought by Plaintiff, Mila Lawsin Fonner, to redress intentional violations by defendants : Travelers Home & Marine Insurance Co., Hartford, Connecticut; Travelers Home & Marine Insurance Co. Wyomissing, Pa. Hinkle Agency, Inc. 975 Second Street Pike, Richboro, Pa. 18954 ; ICS Merrill of Jacksonville, Florida; Christopher T. Ryan, Ridley Park, Pa; of rights secured by the laws of the United States and the statutory laws of the Commonwealth of Pennsylvania.

MEMORANDUM OF LAW IN SUPPORT OF COMPLAINT :

This Action was initially brought pursuant to laws relating Automobile Insurance Coverage in 75 Pa. C.S.A. 1701 et seq Amendments to the Pennsylvania Motor Vehicle Financial Responsibility Law known as ACT 6 ' MVFRL ' which took effect on July 1, 1990.

The changes substantially affect rights of anyone become involved in accident. Under this law, all insurance companies can offer many choices in motor vehicle insurance, the choices include medical benefits, income loss benefits and funeral benefits .

A. HISTORY :

1. Plaintiff took a Wage Loss Policy of \$2,500/month, maximum of \$50,000 (see exhibit A First Party Benefits Coverage Endorsement A37021) , by paying extra premium for extra coverage for Wage Loss in her Automobile Policy #9847361801011 with Travelers from Hinkle Agency, Inc. Located at 975 Second Street Pike, Richboro, Pa. 18954. Plaintiff has been paying extra money for this coverage since 2005 without any break in premium payments nor any claims filed as financial protection in case of car accident.
2. On February 5, 2011, while driving home from work, Plaintiff incurred a car accident. Was rear-ended.

Plaintiff sustained cervical and lumbar injuries treated by St. Mary Hospital ER, followed by her family doctor, Dr. John Lawless, Dr. Semohuck, Dr. Einhorn, Orthopaedic Received three (3) Epidural injections at cervical and lumbar areas from Dr. Goldberg of Aria Hospital , for Pain and Nova Care for Rehab for two Years.(exhibit B medical docs.)

3. On June 10, 2011, Travelers , subjected Plaintiff to a Medical and Physical Examination through their selected Doctor Amy Fitzsimmons (see exhibit C -- her evaluation report.) , due to injuries, her prognosis to be successful in returning to work is extremely guarded. ' She should not be doing a job with any kind of lifting ').

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4. Travelers , due to the above Evaluation Report immediately stopped the bi-weekly payment which they have been paying thru her wage loss policy with Travelers.

Immediately after Travelers receipt of the Evaluation, Kami Hause, Travelers Representative handling the claim, called Plaintiff to go again for a second Medical examination . Plaintiff refused.

5. Plaintiff , prior to the accident, was working with Statesman Health and Rehabilitation Center in Levittown, Pennsylvania as Nursing Supervisor at \$34.50/ hr.(see exhibit D- earnings)

B. STATEMENT OF CASE :

1. This case started September 21, 2011 in District Justice of Peace of Richboro, Pennsylvania by a lawsuit filed by Plaintiff against Travelers Home and Marine Insurance Co. (for brevity now Travelers) for non -payment of Wage Loss for three months , July, August and September 2011, based on her Wage Loss Policy of \$2,500/month maximum \$50,000 . A First Party Benefits Coverage Endorsement A 37091 (see exhibit A) an extra premium coverage in her Automobile Policy # 9847361801011.

(Payment was stopped by Travelers after Plaintiff had a Physical and Medical Examination by their own Dr. Amy Fitzsimmons and receiving a report from her. (See exhibit C- Report).

Due to pending Litigation, Travelers paid \$5,000 for two months . July and August, 2011. (see exhibit E) .

2. Plaintiff won the case and Judge Benz of Claims Court awarded Judgment on September 21, 2011 (See exhibit F) . Travelers paid Plaintiff \$2,641.00 for September 2011. (see exhibit G - checks) .
 3. On November 21, 2011 Plaintiff again filed a Lawsuit in District Justice of Peace against Travelers for non – payment of wage loss for October, November and December 2011, Per Wage Loss Insurance Policy.
 4. On December 20, 2011 Plaintiff won the case and was awarded \$7,641 by Judge Benz of District Justice of Peace (see exhibit G).
- Travelers refused to pay the above Judgment Award to Plaintiff .
5. On January 9, 2012, Travelers sent a Notice of Appeal from District Justice of the Peace to Bucks County Common Pleas Court District . Assumpsit Action .
 6. On January 9, 2012 , Travelers filed an appeal for the \$7,641 Judgment of Judge Benz A ' Praecepte for Rule to File Complaint Rule Returnable Twenty days after Service Thereof ' . (see exhibit H) .

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Travelers filed this Praecipe Under caption ' Bucks County Common Pleas Court Court No. 2012 – 00150 ' .

7. On January 12, 2012, Plaintiff filed a ' Complaint ' in Assumpsit (see exhibit I) .
8. On February 14, 2012, Travelers filed to dismiss Plaintiff's Complaint. (see exhibit J) .
9. On March 5, 2012, Judge Waite denied Traveler's dismissal Motion. (see exhibit K) .
10. ON May 15, 2012, Travelers Petitioned at Bucks County Court of Common Pleas, to again ' submit to Physical Examination ' by their own doctor.
11. ON June 6, 2012, Judge Waite of Bucks County Common Pleas Court , Ordered Physical Examination.
12. On June 6, 2012, Plaintiff filed an Amended Complaint. (see exhibit L) .
13. On June 18, 2012, Plaintiff filed a Motion For Hearing at Bucks County Court ' To Stop Travelers from compelling Plaintiff to a Physical Examination ' .
14. Judge Waite Ordered Hearing for Physical Examination for Aug. 1, 2012 . (see exhibit M) .
14. On July 6, 2012, Travelers switched Lawyers . Daniel Brown, Esquire now withdrawing from the case and Michael T. Droogan, Jr. Entering . Plaintiff was not notified.
15. On July 9, 2012, Travelers under Michael T. Droogan, Jr. Esquire filed a Civil Complaint ' NOTICE OF REMOVAL ' as a Petitioner in U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA.

Reason : DIVERSITY. (See exhibit N) .
16. On July 25, 2012, Plaintiff filed for ' DISMISSAL OF TRAVELER'S PRAECIPE TRANSFER OF CASE TO U.S. DISTRICT COURT ' at Bucks County Court.
17. On July 26, 2012, Judge Waite on Court's Paper filed at Bucks County Court ' File not sent Judge Waite's still has file August 21, 2012 ' . Plaintiff was never notified by Bucks County Court , of file not being transferred to U.S. District Court. (see exhibit O – Copy of Bucks county PSI /Viewer/Detail) .
18. On August 1, 2012, Hearing for Plaintiff's Dismissal of Travelers 2nd Medical was

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conducted by Judge Waite at Bucks County Court. Plaintiff was present , but Travelers was absent. Reason : Phone Call was made by Mr. Droogan to the

Court Clerk explaining that the said case has been transferred already to Federal Court.

This was false as the case was still with Bucks County Court per Judge Waite's notation marked on the list of activities of case noted in the viewer (see exhibit O) .

19. July 17, 2012, Plaintiff files Petition for Remand of case from U.S. District Court to Bucks County Court, (see exhibit P) based on 'Notice of Removal ' .

20. On August 13, Judge Joyner of U.S. District Court denied said 'Remand ' (exhibit Q) .

21. On August 16, 2012, Judge Joyner of Federal Court denied Plaintiff's Petition for Hearing of said Remand. (see exhibit R) .

REASON : Because of Diversity . Judge Joyner argued in favor of Travelers, That Travelers being incorporated and it's Principal place of business is Connecticut is foreign to Pennsylvania, therefore, Traveler's argument of ' Diversity ' and Plaintiff being Citizen of Pennsylvania therefore, diversity applies and U.S. District Court has ' Jurisdiction. ' to hear the case.

This very Reason is stated by Travelers as their main Argument for their 'Notice of Removal ' of case from Bucks County Court to Federal Court (see exhibit N) .

PLAINTIFF DISAGREES :

1. 28 U.S.C. Sec. 1332 (a) – Diversity of citizenship – The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs , and is between Citizens of different states. Travelers is incorporated in Delaware but it's Principal place of business is Pennsylvania. And is doing business. (see exhibit S – Travelers claim letter to plaintiff originating from Pennsylvania) .

a. Travelers is conducting business in Pennsylvania. It has a Claims Office located at 1105 Berkshire Blvd., Wyomissing , Pennsylvania 19601. Tracy Faller, Supervisor of Claims , conducting my claim , is located at same address.

Kami Hause, Travelers Representative handling my claim was based in Wyomissing, Pa.

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All Travelers checks were issued from Wyomissing, Pa. , Reading, Pa.

b. Hinkle Agency, Inc. who sold the Travelers Automobile Policy with Wage Loss Policy to Plaintiff, is located at 975 Second Street Pike , Richboro, Pa. 18954 .

c. About 1500 or more Travelers Agencies scattered throughout Pennsylvania are selling and conducting Travelers Insurance Policies from Automobile, Home, Jewelry, rental, boat and of more than 100 Travelers Policies.

d. By the foregoing , Travelers, is therefore a Citizen of Pennsylvania,

Plaintiff, Mila Lawsin Fonner, resides at 30 Gambrel Court Holland, Pennsylvania 18966 .

Everybody is a Citizen of Pennsylvania. ' Diversity ' Claim by Travelers is FALSE AND WRONG . U.S. District Court for Eastern District of Pennsylvania has NO JURISDICTION OVER THIS CASE AND THEREFORE LACKS POWER TO LITIGATE. ANY ACTION made by THIS COURT was NULL AND VOID , based on this Law.

SECTION 1446 (c) (1) REQUIREMENTS : Removal based on Diversity of Citizenship.

A case may not be removed under subsection (b)(3) on the basis of jurisdiction conferred by section 1332 [28 USC subsection 1332] more than a 1 year after commencement of the action, unless the district court finds that the plaintiff has acted in bad faith in order to prevent a defendant from removing such actions.

This case started in Mag. District Court 07-2-01 of Richboro, Pa. Filed by Plaintiff in Sept 21, 2011. Lawsuit was for non-payment of Wage Loss for three months , starting July 1, 2011 through September 1, 2011. Travelers via their claims office in Wyomissing, Pennsylvania , issued a check for \$5,000 for months of July and August 2011. (see exhibit D.1- copy of check) .

Travelers by their payment to Plaintiff , has acknowledged it's liability starting in July 1, 2011. therefore, TRAVELERS has started the ' ACTION ' by July1, 2011. Travelers filed 'NOTICE OF REMOVAL' IN BUCKS COUNTY COURT , JULY 26, 2012 . More than a year passed. This case captioned Bucks County Common Pleas 2012-00150, was still active and still alive.

By this law, The requirement for Removal on basis of Diversity was not met.

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REASON FOR TRANSFER OF CASE :

Plaintiff FEELS UNJUSTLY DESCRIMINATED in Court by Bucks County Common Pleas of It's Handling of HER CASE. The following presents :

Judge Waite of Bucks County Court did not NOTIFY Plaintiff that there was no transfer of documents to Federal Court AS STATED ON JULY 26, 2012 on 'bucks.pa.us/PSI /Viewer/Detail. ' NOT SENT JUDGE WAITE STILL HAS FILE

8/21/2012 ' Case was never transferred according to Bucks County Prothonotary.

(see exhibit O) .

Case was tried under caption 'United States District Court for the Eastern District of Pennsylvania 12 – cv -3839 '.

It started July 9, 2012 with 'Travelers Petition ' Notice of Removal ' and ended Judge Joyner 'Dismissal of Case ' around August 2013. This is more than a year of unnecessary Litigation that Plaintiff had to go through with Motions after Motions in Federal Court.

Notification by Bucks County Court and Issuance of denial could have stopped Plaintiff from undergoing all unnecessary effort, travel , time , paper work which had caused sleepless nights and anxiety , in trying to research, retyped word for word , to correctly respond to all deadlines and motions by Federal Court and Travelers .

Plaintiff after discovery that Case No. 2012-00150 was still active in Bucks County according to Prothonotary Clerks, requested Subpoenas forms. Prothonotary clerk gave Plaintiff forms with authorized Signatures on it only after checking the Status of the case and receiving filling fees for three forms.

On August 12, 2013, Plaintiff files at Federal Court again a Remand to Bucks County Court (see exhibit T). Judge Joyner denies.

On August 20, 2013. Plaintiff files a Motion for Stay for Five days from August 17, 2013 to August 22, 2013, for Plaintiff to file it's Third Amended Complaint. (see exhibit U) .

On August 23, 2013, Plaintiff files it's Third Amended Complaint in Bucks County Court of Common Pleas. (see exhibit V) .

On October 16, 2013. Bucks County Court via it's Prothonotary Office after checking if Case was still active , and received filling fees for three Subpoenas forms to ' Produce Documents or Things for Discovery Pursuant to Rule 4009.22 signed by Patricia L. Bachtie , Prothonotary and Patricia A. Zimmerman Deputy , Plaintiff issued Subpoenas to following Individuals:

a. Christopher Ryan of 548 Darby Rd., Ridley Park, Pa. 19078.

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- b. Tracy Faller of Travelers 1105 Berkshire Blvd. Wyomissing, Pa. 19601.
- c. John Ferrante of Ics Merrill of Jacksonville, Florida.

(See. Exhibit W - copies of Subpoenas) .

On November 1, 2013, Travelers Motioned in Bucks County Common Pleas , to Dismiss Plaintiff THIRD AMENDMENT.

On December 5, 2013, Bucks County Court Admin. Issued a Problem Notice to Travelers RE : Dismiss l motion of Plaintiff's Third Amended Complaint . Court orders ' Rule to show cause ' . (see exhibit X- court's Order to show cause) .

All motion papers were returned to Travelers but Bucks County Court does not show Travelers response to the Court . (see exhibit Y Bucks county Prothonotary List Viewer) .

Plaintiff was not notified by Bucks County Court of 'Motion papers for Dismissal of Plaintiff's Third Amended Complaint was returned to Travelers due to ' Rule to Show Cause ' Plaintiff had no idea of returned papers.

On December 19, 2012, while returned dismissal papers where still with defendant, unanswered to the Court , Judge Waite Ordered Dismissal of Plaintiff's Third Amended Complaint. (see exhibit Z-- court order) . Argument to ' Rule to show Cause ' by the defendant was never taken up by Bucks County Court.

The Order came verbatim from defendant 's formatted 'Order ' . (see exhibit Z) . This was a Surprise Action by the Judge considering that the defendant failed to answer the court's order ' Rule to Show Cause ' .

On December 27, 2013, Plaintiff Motioned in State Court, for new Trial in an attempt to reverse Court Judgment as errors were made and the Order contained Statements that were very prejudicial to Plaintiff's Rights to fair Judgment. (see exhibit 1).

On January 8, 2014 , Plaintiff 's motion for new Trial based on Judge Waite's Court Order December 19,2013 was Denied. (see exhibit 2) .

On January 17, 2014, Plaintiff filed a Motion for a Hearing as an Amendment to Motion for New Trial . (see exhibit 3). Motion Still remains unanswered by Court as of this writing.

On March 12, 2014, Plaintiff filed Motion for Stay to write 4th Amended Complaint. (see exhibit 4) .

On March 17, 2014, Judge Waite Denied Motion for Stay. (see exhibit 5) .

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Based on the foregoing, Plaintiff without having a day in court, and without a fair judicial process, a Jury Trial requested in her Complaint, now wants her case be heard and equal Justice be rendered in this Honorable Court. A Constitutional Right that was denied.

The Following are Fraudulent Actions by Travelers which bear credence to the case.

1. CASE ORIGINATED IN BUCKS COUNTY COMMON PLEAS COURT, fraudulently transferred to Federal Court – highjacked, lying to both courts as stated on it's Praecipe to 'Remove Case based on 'Diversity.' which we know now is not true.
2. Misled Courts by not mentioning Plaintiff's desires to settle case. Fact : Plaintiff offered Settlement of Case from the beginning of case while still at Mag. District Court. For \$30,000 (see exhibit 6) and subsequently less . (exhibit 7) Again another Offer was submitted in writing through Mr. Droogan and discussed via telephone in July 2013. (exhibit 8) .
3. Travelers, continued to portray Plaintiff as out for 'big bucks' when in fact it's the defendant, Travelers who had moved this case to different courts to avoid payment to Plaintiff even it was judged in favor of Plaintiff.

Case in point, Issuing a PRAECIPE as an Appeal from Mag. District's Judgment January 9, 2012 in Bucks County Court (see exhibit F) forcing Plaintiff to file a Complaint now to a higher court of a case she just won at Claims Court. (see exhibit E) .

Travelers have been issuing ' PRAECIPES ' to circumvent the law and denying Judicial process. 2nd Praecipe was ' Notice of Removal ' , highjacked the said case from State Court to Federal Court.

4. Travelers hired a Detective Agency, ICS Merrill based in Jacksonville Florida, for illegal Surveillance and stalkings of Plaintiff witnessed by Neighbor who will testify in Court. (see exhibit 9 - Letter from Mr. Droogan sending video of Plaintiff done by ICS Merrill) .

Illegal Surveillance, and stalkings (no court order) , for months without being noticed by Plaintiff until she drove to the dry cleaning store and noticed being followed through the rear-view mirror. Plaintiff noticed this particular old beat-up black van with black painted windows following her all over the place even when she tried to escape of being followed by going through the development making turns at different streets, still couldn't lose him. This driver must have a ' GPS ' . Concerned and terrified decided to go home immediately to call 911. He followed Plaintiff all the way to her house.

Northampton Police (plaintiff lives in Northampton township) arrived in two vehicles. They stated that the reason I was being followed is because ' you have a Civil Case .

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Plaintiff went to Northampton POLICE station to inquire about the individual and who was paying him.

Northampton Police Incident Report # 54-11-12086 dated 10/24/2011 filed falsely by Christopher Ryan , his employment as ICS instead of ICS Merrill, two entirely different Detective Agencies , address Voorhees, NJ instead of Jacksonville Fla. , wrong phone No. and his real name is Christopher T. Ryan. He intentionally filed a False Police Report to Northampton Police (see exhibit 10) .

2nd Scary incident. - Plaintiff was habitually going to St. Bede's chapel . Again being followed up to inside the Chapel. Plaintiff observed this individual inside the Chapel for months moving front and back and around Plaintiff, which got her scarred and concerned which made her follow all his moves as most of times there were only two of them in this small chapel. Plaintiff could no longer concentrate on her prayers.

One Sunday at Noon time , a seating arrangement was made in the Chapel by Christopher T. Ryan, which included 2 chairs put closely to each other that, it was hardly any space in between. This would be difficult for anybody in the Chapel to see of what was going on between the 2 people the way the chairs were arranged. Plaintiff saw the sitting arrangement as she opened the door leading inside the Chapel and was scared seeing this man later to be identified by Plaintiff as Christopher Ryan was already sitting on the next chair that she normally sits. She decided not to sit down on her usual chair and started to question her security as she was most of times alone with this man. This happened about summer 2012.

The most scary of all : Christopher T. Ryan is an EMT certified. According to his Profile (exhibit 11) .

Meaning, He can administer a Toxic shot that can kill anybody in seconds , by a Hypodermic needle. Was the seating arrangement with him sitting closely to me was an 'ATTEMPTED MURDER ? ' .

3rd incident :

Plaintiff was going to church to attend Saturday 8: am at St Bede's Church.

Driving on Middle Holland Road heading toward East Holland Rd where the church is located, Plaintiff almost had a collision which would have her car sandwiched from her driver side by an old chocolate brown Ford Explorer Car with tan painted cover wings coming from Old Jordan Rd and on passenger side by a medium size white car exiting on the entrance of Tapestry Development , being on the wrong side of the road. Plaintiff managed to escape the collision by a hair. She went up the edge- right side Pedestrian walk way and went down to the street of middle Holland Rd as fast she could drive to church without looking back or stopping to check out.

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Coming back from church, Plaintiff tried to figure out of what just happened. Driving on Middle Holland Rd , tried to figure out why this two-tone chocolate brown/tan Ford Explorer was so

close into collision on my driver side. Did the driver missed the stop sign at Jordan Rd, that it did not stop or was the stop sign obscured by high thick bush covering the stop sign or was the driver drunk or was sleepy that he couldn't stop when he should have stopped.

All the answers were ' No ' . It was impossible to comprehend of what just happened . But why would a white car be exiting on the entrance to the development, being on the wrong side of the street . The only explanation I could think of was...This was a 2 Men -Planned -Hit Job to kill me making it looked like a car accident.

Incident again was reported to Northampton Police which they can only document since there was no names and licenses to Report. (exhibit 12 – more Police Reports) .

4th incident :

Driving from church , traveling on Middle Holland Rd, a red light stopped me. I was the third car from the light which intersected Rock Way Rd. . In front of me was a dark chocolate / tan Ford Explorer which was old looking and had very particular low tires for Ford Explorer. This caught my attention as the car that almost hit me on the same road last summer had similar features. I immediately took the license plate . As I was behind this car , the driver of this chocolate brown /tan car looked at it's rear view mirror. WE HAD EYE CONTACT. THE face

that I saw was the same face of the man that was in the chapel with me for weeks and who had arranged the chairs so closed to each other and now also driving the same car that almost killed me. He immediately made a quick left turn to Tapestry development where the almost car accident had happened.

Incident was reported to Northampton Police .

TRAVELERS' LAWYER, MR. MICHAEL DROOGAN THREATENED AND INTIMIDATED PLAINTIFF :

This happened Summer 2013. Mr. Droogan made a phone call to Plaintiff stated ' I will personally sue you for millions that you will have no food on the table ' . He then hanged up.

This case is about Travelers wage loss Insurance Policy , Mr. Droogan is the Attorney defending Travelers, by that phone call, he now PERSONALIZED this case.

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WHEREFORE your Honor, Plaintiff, Mila Lawsin Fonner is demanding from Travelers an amount of \$20 Million Dollars as Compensation for this Lawsuit. She also Demands from this court a Jury Trial by her Peers.

Respectfully submitted,


MILA LAWSIN FONNER
Plaintiff

Date: 5/8/2014

Certified Copy sent to :

1. Disciplinary Board of Supreme Court of Pa.
820 Adams Ave. Suite 170
Trooper, Pa. 19403
2. Travelers Home & Marine Insurance Co.
One Tower Square
Hartford, Ct. 06183-1001
3. Travelers Home & Marine Ins. Co.
1105 Berkshire Blvd., Wyomissing, Pa. 19601
4. Hinkle Agency, Inc.
975 Second St., Richboro, Pa. 18954
5. ICS Merrill
9485 Regency Sq. Blvd. Suite 400
Jacksonville, Fl. 32225
6. Christopher T. Ryan
548 Rd, Ridley Park, Pa. 19078

Case ID: 140500974

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA



MILA LAWSIN FONNER
Plaintiff

✓

TRAVELERS Home =
Marine Insurance Co.
et al

defendants

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

Case ID: 140500974